

# Morgan Lewis

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February 7, 2025

**VIA ECF**

Honorable Cathy L. Waldor, U.S.M.J.  
Martin Luther King Jr. Courthouse  
50 Walnut St.  
Room 4040, Courtroom 4C  
Newark, NJ 07101

Re: *Doe v. Shao et al.*  
Civil Action No. 2:24-cv-09972-BRM-CLW

Dear Judge Waldor:



We represent Defendant Vivian Wang ("Defendant Wang") in the above-referenced matter. We respectfully write to request that the Court extend the deadline for Defendants to answer, move, or otherwise plead in response to Plaintiff's Complaint which is currently set for February 13, 2025 (Dkt No 19). As Your Honor is aware, a ruling on the Motion for Protective Order will impact the parties' initial pleadings in this matter because they concern Plaintiff's request to proceed anonymously. Therefore, Defendant Wang requests that Defendants be permitted to file their respective responsive pleadings in relation to the ruling on the Motion for Protective Order (Dkt No. 2), as follows: (1) if the motion is granted, within 14-days after the Court's decision on the motion, or (2) if the motion is denied, within 14-days after Plaintiff refiles his Complaint not under pseudonym. Defendant Wang makes this request in an effort to preserve resources for the parties and the Court.

On February 6, 2025, counsel for Defendant Wang conferred with Plaintiff's counsel to submit a joint request by stipulation, and has not received a response from Plaintiff as to whether he consents or opposes this request. Nevertheless, in an effort to provide the Court with sufficient time to address this request, Defendant Wang submits this request on behalf of Defendants before a decision on the Motion for Protective Order has been issued and before the time to answer, move, or otherwise plead in response to Plaintiff's Complaint has expired.

The parties have previously stipulated to extending the time to answer, move, or otherwise plead in response to Plaintiff's Complaint in this matter on two occasions while the Motion for Protective Order has been pending. (Dkt Nos. 15 and 19). A further extension of time to answer, move, or otherwise plead in response to Plaintiff's Complaint will not prejudice the parties or otherwise cause the Court delay.

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In the alternative, should Your Honor require a more formal request to extend the time for Defendants to answer, move, or otherwise plead in response to Plaintiff's Complaint, Defendant Wang requests permission to file a more formal application.

We greatly appreciate the Court's time and consideration regarding this request.

Respectfully submitted,

/s/ Terry D. Johnson  
Terry D. Johnson

cc: All counsel of record via ECF